

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

Xiafen “Sherry” Chen,

Plaintiff,

v.

United States of America,

Defendant.

Case No. 1:19-CV-00045

Hon. Timothy S. Black

**JOINT STATUS REPORT REGARDING SETTLEMENT NEGOTIATIONS**

On April 22, 2022, this Court granted Plaintiff’s unopposed motion to stay the deadline to file a motion for leave to amend the complaint and ordered the parties to file a joint status report updating the Court on their settlement negotiations within 30 days. Following the parties’ joint status report filed on May 20, 2022 (Dkt. No. 46), the Court ordered the parties to file a joint status report updating the Court on their settlement negotiations by June 20, 2022. The parties did so (Dkt. No. 47), and the Court ordered that they file their next joint status report by July 15, 2022.

Since the Court’s Order, the parties have continued to make progress towards a settlement agreement. As the parties previously reported, on May 13, 2022, counsel for Defendant sent a settlement proposal to counsel for Plaintiff. Plaintiff and her counsel carefully reviewed the government’s proposal and, in consultation with the parties’ agreed-upon mediator, Judge David Levi, submitted a counterproposal on June 8, 2022. The government considered that counterproposal, and on July 8, 2022, rejected it and issued a counter-offer. On July 12, 2022, counsel for Plaintiff informed the government that Plaintiff is prepared to accept an overall dollar amount near the government’s proposal, but that various specific issues need to first be resolved.

The parties remain interested in reaching a settlement and believe that an agreement

acceptable to all parties is possible. Accordingly, they jointly request that the Court continue to stay the deadline to file a motion for leave to amend the complaint and order the parties to file another joint status report in 30 days.

Respectfully submitted,

/s/ John Hemann

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**CERTIFICATE OF SERVICE**

I certify that a true copy of the foregoing was filed electronically on July 14, 2022 using the Court's CM/ECF system, which serves copies to all parties of record.

/s/ John Hemann  
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Attorney for Plaintiff